

# **EXHIBIT 2**

FILED IN DISTRICT COURT  
OKMULGEE COUNTY, OKLA.

OCT 25 2017

CHARLY CRINER, COURT CLERK  
By \_\_\_\_\_ Deputy

IN THE DISTRICT COURT IN AND FOR OKMULGEE COUNTY  
STATE OF OKLAHOMA

BEN WOODY, JR., and ROSE WOODY, )  
Plaintiffs, )  
vs. )  
GEICO Casualty Company, a foreign )  
insurer, )  
Defendant. )

**CJ-2017-164**

Case No.  
Attorney's Lien Claimed  
Jury Trial Demanded

**DAMAN CANTRELL**

**PETITION**

**COME NOW** the Plaintiffs and for their Petition and cause of action against the Defendant GEICO Casualty Company, foreign insurer, do allege and state as follows:

**COUNT ONE**

1. That Plaintiffs are residents of Tulsa County, State of Oklahoma.
2. That Defendant GEICO Casualty Company is a foreign insurer as a corporation domesticated in the State of Oklahoma.
3. That on or about the 1<sup>st</sup> day of July, 2016, Plaintiff Ben Woody, Jr., was injured in an automobile accident due to the negligence of an uninsured motorist in Okmulgee County, Oklahoma.
4. As a result, the Plaintiff Ben Woody, Jr., did receive severe, painful and permanent injuries.
5. At the time of the accident, Ben Wood, Jr., was an able-bodied male of 73 years of age, with a normal life expectancy of 11.6 years, according to The United States Life Tables.
6. As a result of the negligence of the uninsured/underinsured motorist, the

Plaintiff did endure conscious pain and suffering, medical bills and expenses.

7. At the time of the incident above described, the Plaintiff was covered for uninsured/underinsured motorist coverage under 1 or more policies issued by the Defendant.

8. The Defendant substituted payment of the liability carrier limits electing not to waive subrogation.

9. The Defendant has evaluated the claim of the Plaintiff in excess of the uninsured/underinsured motorist limits of coverage.

10. The Defendant has failed to pay and refused to pay the proper and legitimate claim of this Plaintiff causing the Plaintiff loss under the policy and consequential damages in excess of \$10,000, and bad faith in the dealings with this Plaintiff and by reason of which Plaintiff is entitled to both actual and punitive damages.

### **COUNT TWO**

**COMES NOW** the Plaintiff Rose Woody and adopts all allegations heretofore set forth in Count I of this Petition, as if fully set forth herein.

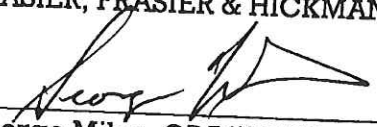
1. At all times material herein Rose Woody was the loving and lawfully married wife of Plaintiff, Ben Woody, Jr., and as a result of the negligence of the Defendant she has suffered loss of services, society, consortium and companionship for which coverage is available under the Defendant's uninsured/underinsured motorist issued policy.

**WHEREFORE**, premises considered, the Plaintiffs, and each of them, do pray for damage against the Defendant in a sum in excess of \$10,000, together with interest thereon, all costs of this action, and for such other relief to which they may be entitled.

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

By:



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